Southwestern Bell Corporation

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January 12, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Michael W. Bennett
Director
Federal Regulatory

Ex Parte

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

Re: CC Docket No. 94-32

Dear Mr. Caton: DOCKET FILE COPY ORIGINAL

In accordance with Commission rules, please be advised that yesterday, January 11th, David Wolter, Jeff Weber, Paul Lemson and the undersigned representing Southwestern Bell met with Bob Pepper, Don Gips, Tom Stanley, Mark Corbitt, Greg Rosston and John Williams of the Office of Plans and Policy regarding the proceeding listed above. Attached is a handout provided in the meeting.

If you have any questions, please let me know.

Sincerely,

Attachment

cc: Mark Corbitt
Don Gips
Bob Pepper
Greg Rosston
Tom Stanley
John Williams

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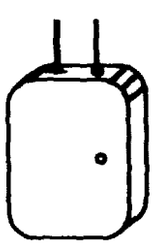
FCC Ex Parte Visit
Docket 94-32

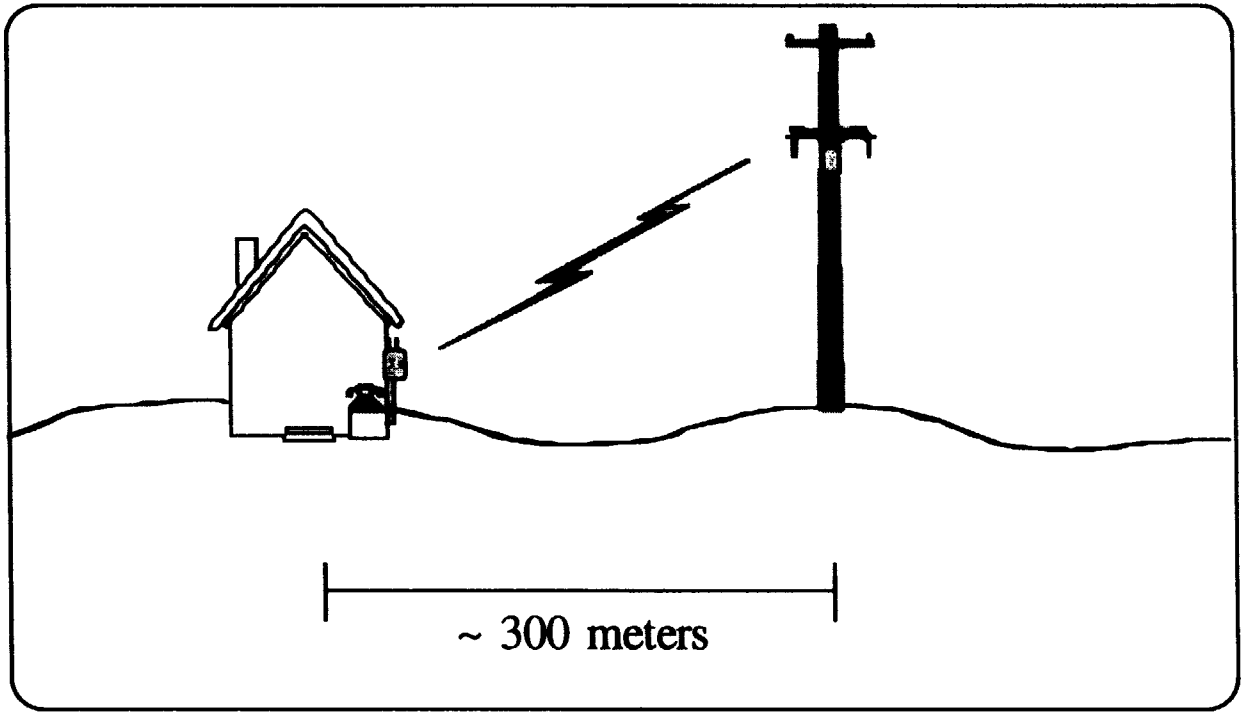
Wireless Local Loop
Southwestern Bell



January 11, 1995

Southwestern Bell
Technology Resources

Wireless Local Loop

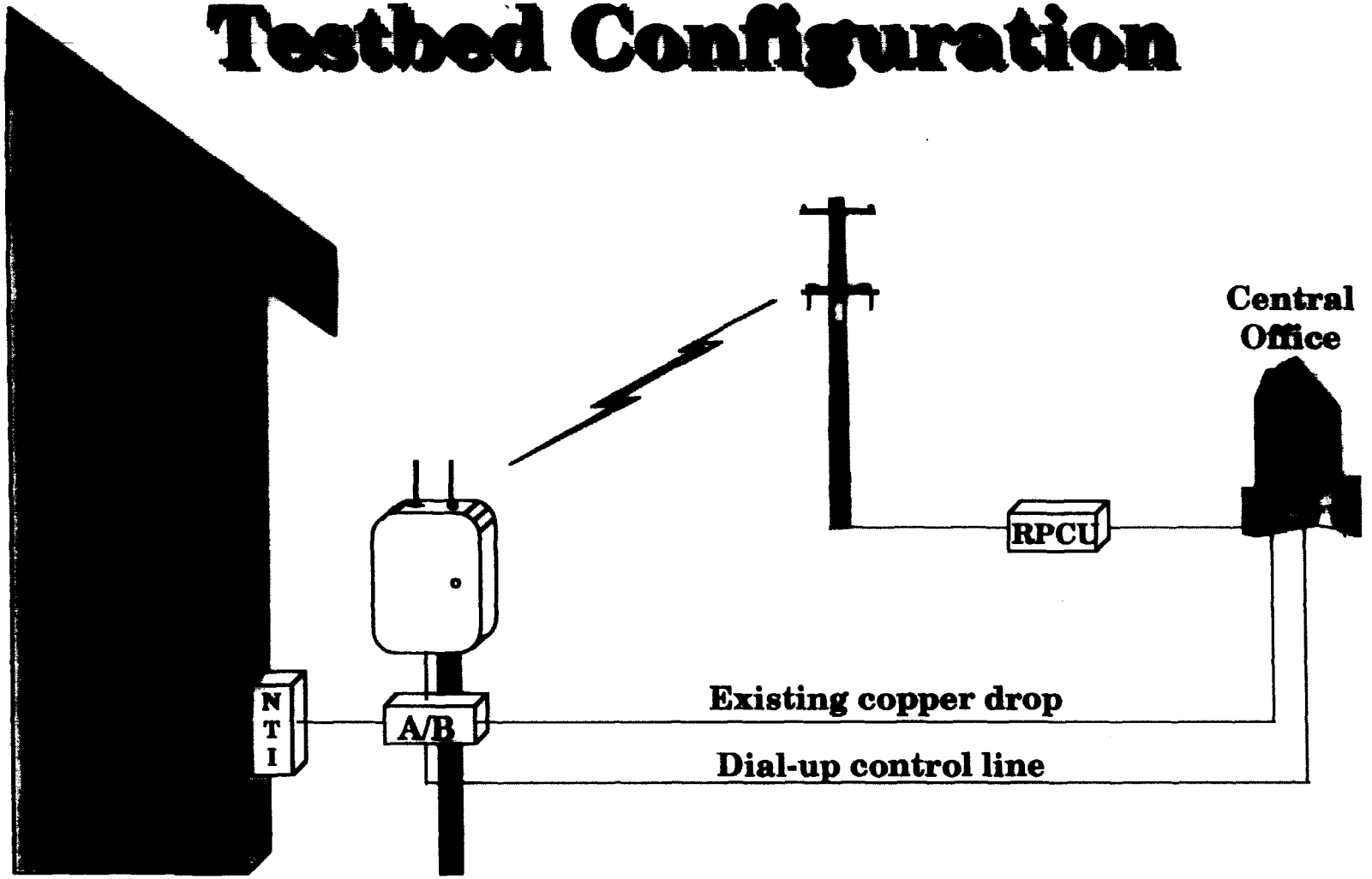


Wireline Voice Quality
Wireline Service Quality

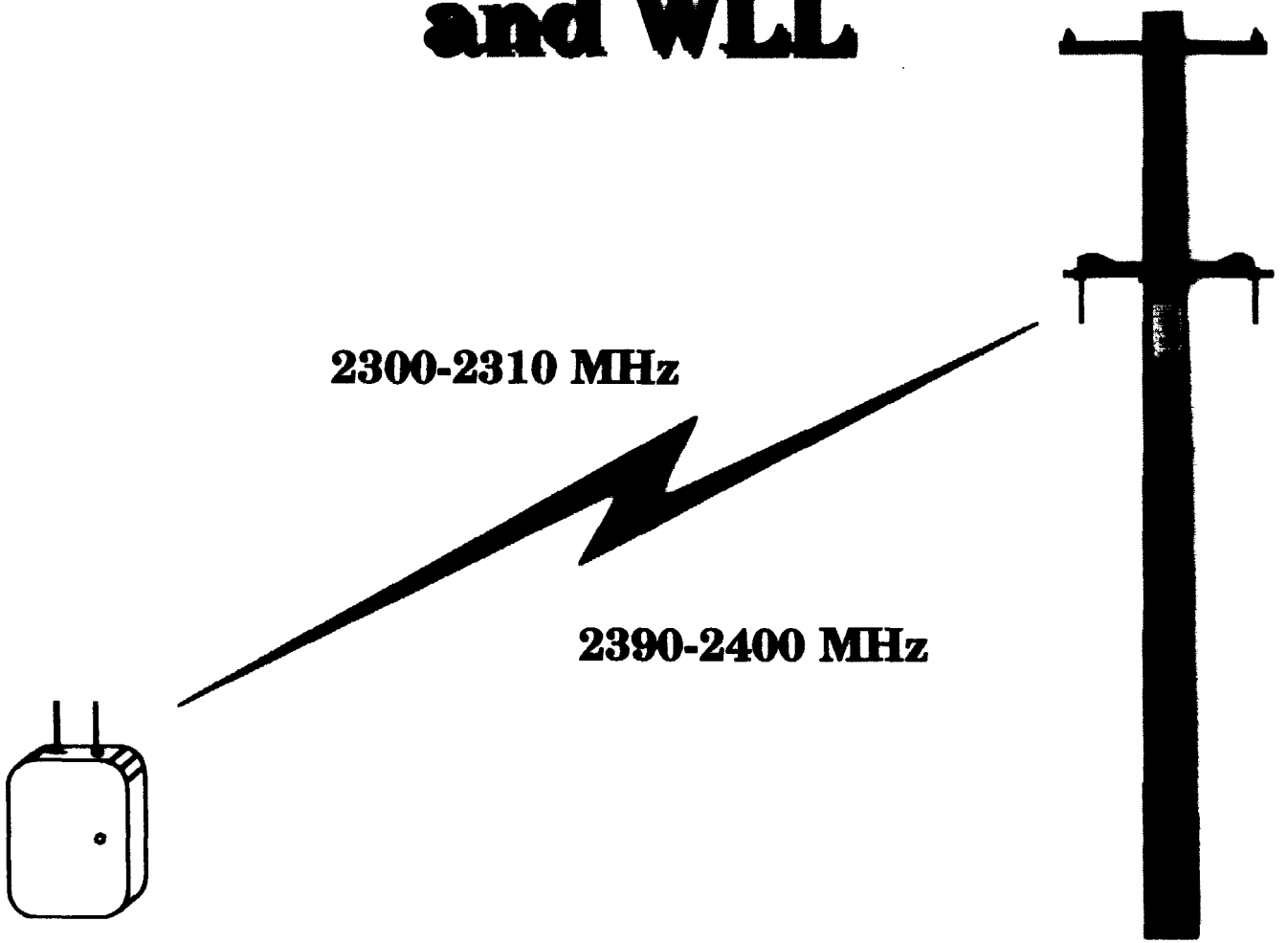
Benefits of Wireless Local Loop

- Reduced capital requirement
- Minimizes stranded capital
- Addresses competition
- Reduced maintenance
- Rapid deployment
- Survivability and quick recovery
- Economically serve unserved and underserved areas

Testbed Configuration



ET Docket 94-32 Spectrum and WLL



Southwestern Bell
Technology Resources

WLL is the Right Service

- **The Commission should allocate the spectrum in question to specific services, not to general fixed and mobile**

- **The record supports the paired allocation of 2390-2400 MHz and 2300-2310 MHz for Wireless Local Loop**

- **Wireless Local Loop clearly provides a greater benefit to the public than any other suggestion for these spectrum bands**

WLL is the Right Service

- These two bands are unique in that they are readily paired
- These spectrum bands are appropriate for wireless local loop
- PCS spectrum is inappropriate for wireless local loop since it is a fixed service
- Low power and frequency reuse lead to highly efficient use of spectrum

WLL is the Right Service

- **The BETRS allocation is restricted in rural use, and is unusable for urban or suburban deployment**

- **Wireless local loop will become a major revolution in telecommunications world-wide. By allocating now, the U.S. has the opportunity to lead this booming market**

- **NTIA has identified 150 MHz of additional spectrum to be reallocated. WLL requires paired spectrum under 3 GHz. The other proposals in this docket can effectively utilize the additional 150 MHz.**

WLL Allocation Suggestions

- License areas should be small and the licensee should be able to partition the area
- The allocation should not be a CMRS allocation attributable under the spectrum cap since this is a fixed service
- Allocate the full 20 MHz to a single license in each license area
- Service can begin quickly once licenses are awarded

Other Suggested Uses Do Not Provide as Much Benefit

- AAVS provides few benefits while using valuable spectrum resources nationwide
- MSS has an existing spectrum allocation, this spectrum is of questionable utility
- Part 15 and Unlicensed Data-PCS are better served with other allocations

Other Suggested Uses Do Not Provide as Much Benefit

- Private Land Mobile has a current allocation that is sufficient given advanced digital technology and the availability of PCS
- Public Safety is valuable, but is better served in the 4.6 GHz band

Amateurs are Accomodated in SWBT's Proposal

- SWBT recognizes the valuable contributions of amateur radio
- Allocate 2400-2410 MHz exclusively to amateur use
- Allocate 2310-2320 MHz to amateurs on at least a secondary basis
- Encourage NTIA to identify further spectrum for secondary use (e.g. 2360-2390 MHz)